

Message

---

**Sent:** 6/6/2019 2:09:05 PM  
**To:** Logan, Doug [DLogan@idem.IN.gov]  
**Subject:** RE: Riverview Energy T147-39554-00033

Hi Doug,

On page 43-44 of the revised ATSD you shared with me, the response to (b)(6) comment 15 appears to respond to the 2 specific questions raised in his comments about 40 CFR 60 Subpart NNN and RRR. However, it looks like there is an additional concern raised within his comment where the commenter states that it is unclear what products the source produces.

(b)(6) December 7, 2018 comment letter says it is unclear what products the source produces that would qualify as a product under subparts NNN and RRR, with additional information supporting his comment (See page 13 of (b)(6) comment letter, specifically the paragraph following the 2 questions already identified in the ATSD). The ATSD's proposed response to this part of the comment explains what a product is under each NSPS, but doesn't identify the product or byproduct listed in 40 CFR 60.667 or 60.707. I'd suggest revising the response to clarify what product or byproduct the source produces. This would help provide a more complete response to this particular comment.

The applicability determination for 40 CFR 60 Subpart RRR (page 51 of the proposed permit TSD) says the source will produce benzene as a byproduct. The applicability determination for 40 CFR 60 Subpart NNN (page 49 of the proposed permit TSD) doesn't appear to identify the product or byproduct, but does say it produces one or more of the chemicals listed in 40 CFR 60.667.

Please let me know if you have any questions.

Thanks,  
Michael Langman  
Environmental Scientist  
Air Permits Section, US EPA Region 5  
Email: [langman.michael@epa.gov](mailto:langman.michael@epa.gov)  
Phone: 312-886-6867

---

**From:** Logan, Doug <DLogan@idem.IN.gov>  
**Sent:** Thursday, June 06, 2019 7:30 AM  
**To:** Langman, Michael <langman.michael@epa.gov>  
**Subject:** Riverview Energy T147-39554-00033

Good morning,

Jenny passed along that you expressed some lingering concern about the comment regarding applicability of the SOCM I NSPS, subparts NNN and RRR. If you can provide something more specific about that and any other issue you may see, I will try to settle everything so we can close out the review tomorrow.

Thank you



Doug Logan  
Environmental Engineer  
Office of Air Quality  
Indiana Department of Environmental Management  

---

(317) 234-5328 • [dlogan@idem.in.gov](mailto:dlogan@idem.in.gov)

**Help us improve!**

IDEM values your feedback

